

Exhibit D

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

-----x

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

Case No: 19-cv-08655 (JHR)

-----x

October 2, 2023

9:12 a.m.

Videotaped Deposition of NonParty
Witness PATRICIA FLORISSI, pursuant to Notice,
before CINDY A. AFANADOR, Certified Shorthand
Reporter, Registered Professional Reporter,
Certified Realtime Reporter, Registered Merit
Reporter, NYSRCR, NYSACR and Notary Public of
the State of New York.

**THIS TRANSCRIPT CONTAINS CONFIDENTIAL
PORTIONS DESIGNATED BY COUNSEL**

1 Patricia Florissi

2 because they adjust the titles.

3 Q. So you understood that one level
4 down was director?

5 A. I thought that -- I didn't know,
6 actually, but that one level down was a
7 director.

8 Q. Did you know whether director
9 encompassed more than one level?

10 A. I wasn't aware.

11 Q. Did you come to learn that?

12 A. I came to learn that when I got
13 to the offer, it said -- I don't know if it
14 was written in the offer someplace it was a
15 level 8 and I learned that a VP was level 10
16 and that the job was at level 8.

17 Q. So in moving from VP to level 8
18 was that actually down level two -- two time
19 down level?

20 A. Yeah.

21 MR. GAGE: Objection.

22 Q. And I'm sorry if I already asked
23 you this, do you know Paul Strong's level?

24 A. No, I do not.

25 Q. Do you know Jonathan Donaldson's

1 Patricia Florissi

2 level?

3 A. No, I do not.

4 Q. Is the work that you do similar
5 to Mr. Strong's?

6 A. I'm not familiar with the work
7 that Paul -- Paul does, Paul Strong does.

8 Q. Are you familiar with how your
9 qualifications compare to his?

10 A. I am not familiar with how they
11 compare.

12 Q. What about Jonathan Donaldson, is
13 the work that you perform similar to his?

14 A. I worked very, very little with
15 Jonathan, only a couple of weeks, I don't
16 think even a month. I don't remember, but --
17 I cannot speak for whether the quality of work
18 that I do is similar to his or not.

19 Q. I'm not speaking as to the
20 quality, I'm speaking as to the nature of the
21 work, do you know if the nature of the work
22 that he does is similar to the nature of the
23 work that you do?

24 A. I do not know.

25 Q. Do you participate in team